

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

GABRIELA NIEVES,)	
)	
Plaintiff,)	
)	
vs.)	
)	Case No. 1:20-cv-320-JMS-DML
CARMEL CLAY SCHOOLS, CHRIS)	
PLUMB, JOHN GOELZ, and)	
RED ROOF INN,)	
)	
Defendants.)	

**DEFENDANT, JOHN GOELZ'S, NOTICE OF AUTOMATIC EXTENSION OF TIME
TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant, John Goelz, by counsel, in accordance with L.R. 6.1(b), respectfully notifies the Court and counsel of an automatic extension of time of twenty-eight (28) days in which to answer or otherwise respond to Plaintiff's Complaint for Damages and states as follows:

1. Plaintiff filed her Complaint for Damages on or about January 29, 2020.
2. The original date for Mr. Goelz to respond to Plaintiff's Complaint is on or before February 25, 2020, which time has not yet expired.
3. This deadline has not been previously extended.
4. Counsel for Mr. Goelz needs additional time to investigate the facts of the matter in order to prepare and file an appropriate answer or otherwise respond to Plaintiff's Complaint.
5. Pursuant to Local rule 6-1(b), Mr. Goelz, by counsel, states: (1) the deadline has not been previously extended; (2) the extension is for 28 day or fewer; (3) the original deadline is February 25, 2020; (4) the extended deadline is March 24, 2020; and (5)

all counsel of record have been advised of this Notice and have no objection to the relief requested.

WHEREFORE, Defendant, John Goelz, respectfully notifies the Court of this extension up through and including March 24, 2020, within which to file an appropriate answer or otherwise respond to Plaintiff's Complaint for Damages.

Respectfully submitted,

METZGER ROSTA LLP

A handwritten signature in black ink, appearing to read "T. J. Meyer", is written over a horizontal line.

Tammy J. Meyer, #14612-49

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 24th day of February 2020, a copy of the foregoing has been filed electronically through the Court's ECF system. Notice of this filing was sent to the following persons by operation of the Court's Electronic filing system.

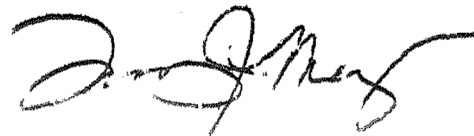
Jessica A. Wegg
Jonathan C. Little
Saeed & Little LLP
133 West Mark Street, No 189
Indianapolis, IN 46204
jessica@slawfirm.com
jon@slawfirm.com
Attorneys for Plaintiff

Liberty L. Roberts
Church Church Hittle & Antrim
Two North Ninth Street
P.O. Box 10
Noblesville, IN 46061
lroberts@cchalaw.com
Attorney for Carmel Clay Schools

The foregoing was also served via U.S. Mail, postage prepaid, upon the parties listed below:

Chris Plumb
5201 East Main Street
Carmel, IN 46033

Red Roof Inn
c/o CTC Corporation Systems
36 Pennsylvania Street, Suite 700
Indianapolis, IN 46204



Tammy J. Meyer

METZGER ROSTA LLP
32 S. 9th Street
Noblesville, IN 46060
(317) 219-4606